

COMPT 80-0024

EEO 80-963

22 JAN 1980

MEMORANDUM FOR: Chairman, Uniform Guidelines Task Force

FROM : Maurice Lipton
Comptroller

SUBJECT : Comment on the Uniform Guidelines Task Force's
Recommendations

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1. In response to the DDCI's request, we have reviewed your proposed implementation plan for Agency compliance with the EEOC, OPM, Department of Labor, and Department of Justice guidelines. In general it is clear that the CIA must comply with the guidelines. While it behooves us to do so and to understand whether there is any bias in our hiring practices, it seems to me that we can do this within the current Agency structure in such a way that it will become nearly second nature in the execution of our recruiting practices. If we go on to set up all of the procedures discussed in your implementation plan, I think we will be unnecessarily generating a new bureaucratic element specifically tailored to meet this problem.

2. I think it would be adequate to implement the policy more generally and offer the following comments:

a. While we have no problem with the idea of an Agency notice on the subject, the draft proposed by the task force needs to be rewritten to make it more succinct and to the point. It should be a simple announcement of the existence of the guidelines and of Agency policy to comply with Federal requirements prohibiting discriminatory employment practices.

b. The self-identification sheet seems innocuous enough, and we see no problem with including it as a part of the application package. We note that since completion of the form would be voluntary, race information for statistical purposes would be imprecise. However, this might not be a concern since the proposed procedure would limit the definition of an applicant to those who complete the form along with other pertinent application papers.

c. The proposed summary reports--for new hires and promotions--will generate lots of paper not to mention the time required to maintain and tabulate the data. Would it not be possible to

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maintain the record--at least on applicants/new hires--centrally in O/PPM? And is it necessary to record data by occupational series? What about the applicant not placed in process but considered for two or more positions in different occupational series or in different offices? Statistical data in such cases would be distorted and could lead to erroneous conclusions, particularly in applying the "4/5th's" or "80 percent" rule.


Maurice Lipton

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